

**RESHMA KAMATH**

Mailing Address:

700 El Camino Real, Suite 120, #1084

Menlo Park, California 94025, United States

Ph.: 650 257 0719, E.: reshmakamath2021@gmail.com

Plaintiff, *In Propria Persona*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RESHMA KAMATH,

Plaintiff,

v.

COINBASE, INC.; WELLS FARGO  
BANK, N.A.; AND DOES 1-10,  
INCLUSIVE,

Defendants.

**Case No.: 3:23-cv-03533-CRB**

**EXHIBIT A, EXHIBIT B**

[ NO MOTION TO RE-OPEN WILL BE  
FILED, THE COURT MUST *SUA*  
*SPONTE* RE-OPEN AFTER  
DEFENDANT WELLS FARGO IS  
SERVED ALONG WITH SEVRICE  
UPON THE THIEF-DEFENDANTS  
WHO STOLE FROM PLAINTIFF  
RESHMA KAMATH. IF THE CASE  
GETS DISMISSED BASED ON  
ABUSE, THEN PLAINTIFF KNOWS  
WHAT TO DO NEXT ]

# EXHIBIT A



Reshma Kamath &lt;reshmakamath2021@gmail.com&gt;

**KAMATH V. COINBASE - 4:23-cv-03533-KAW**

3 messages

**Reshma Kamath** <reshmakamath2021@gmail.com>

Wed, Oct 11, 2023 at 3:56 PM

To: Alex Whitworth &lt;Alex.Whitworth@bclplaw.com&gt;, Makaela O'Connell &lt;makaela.oconnell@bclplaw.com&gt;

Hello Alex and Makaela:

Please see below. I wanted to inform you of the change of date:

**CLERK'S NOTICE CONTINUING INITIAL CASE MANAGEMENT CONFERENCE: Parties are hereby notified that the initial case management conference previously set for 10/17/2023 is continued to 11/14/2023 01:30 PM in Oakland, this proceeding will be held via a Zoom webinar. Joint case management statement due by 11/7/2023.**

Sincerely,

*Reshma Kamath*

## Law Office of Reshma Kamath

Counselor-at-Law | 2022 Elite Lawyer | Lawyers of Distinction

Address: Law Office of Reshma Kamath

700 El Camino Real Suite 120, #1084, Menlo Park, CA 94025

Phone: 650 257 0719 | E-mail: [reshmakamath2021@gmail.com](mailto:reshmakamath2021@gmail.com) |

LinkedIn: [www.linkedin.com/in/globalcitizenwithjd/](https://www.linkedin.com/in/globalcitizenwithjd/) |

Website: [www.myinstalawyer.com](http://www.myinstalawyer.com) |



**RESHMA KAMATH**  
WWW.MYINSTALAWYER.COM



*Selected to Rising Stars: 2023*



2024

**CONFIDENTIALITY NOTICE:** This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication. Thank you for your cooperation. To ensure compliance with Internal Revenue Service Circular 230, we inform you that any tax advice contained in this communication is not intended or written to be used, and cannot be used for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any tax-related matter(s) addressed herein.

**Alex Whitworth** <Alex.Whitworth@bclplaw.com>  
To: Reshma Kamath <reshmakamath2021@gmail.com>  
Cc: Martha Kohlstrand <Martha.Kohlstrand@bclplaw.com>

Mon, Nov 13, 2023 at 11:10 AM

Ms. Kamath,

Do you have the Zoom login information for tomorrow's hearing?



ALEXANDRA WHITWORTH  
Partner  
BRYAN CAVE LEIGHTON PAISNER LLP - San Francisco, CA USA  
alex.whitworth@bclplaw.com  
T: +1 415 675 3463

[Quoted text hidden]

This electronic message is from a law firm. It may contain confidential or privileged information. If you received this transmission in error, please reply to the sender to advise of the error and delete this transmission and any attachments.

We may monitor and record electronic communications in accordance with applicable laws and regulations. Where appropriate we may also share certain information you give us with our other offices (including in other countries) and select third parties. For further information (including details of your privacy rights and how to exercise them), see our updated Privacy Notice at [www.bclplaw.com](http://www.bclplaw.com).

**Reshma Kamath** <reshmakamath2021@gmail.com>  
To: Alex Whitworth <Alex.Whitworth@bclplaw.com>  
Cc: Martha Kohlstrand <Martha.Kohlstrand@bclplaw.com>

Mon, Nov 13, 2023 at 11:43 AM

There is no hearing tomorrow. It got continued to next year.

Sincerely,

Reshma Kamath, Counselor-at-Law  
Law Office of Reshma Kamath

Contact Information:  
Law Office of Reshma Kamath  
700 El Camino Real, Suite #120-1084, Menlo Park, CA 94025 | 650 257 0719 | [reshmakamath2021@gmail.com](mailto:reshmakamath2021@gmail.com) |  
[www.myinstalawyer.com](http://www.myinstalawyer.com) |  
[www.linkedin.com/in/globalcitizenwithjd/](http://www.linkedin.com/in/globalcitizenwithjd/)

Rising Stars 2023  
Elite Lawyers 2022 2023  
Lawyers of Distinction 2023  
Best Lawyers 2024

[Quoted text hidden]

[Quoted text hidden]



Reshma Kamath &lt;reshmakamath2021@gmail.com&gt;

**Kamath v. Coinbase, Inc. et al - INTERNAL AGREEMENT ONLY**

10 messages

**Reshma Kamath** <reshmakamath2021@gmail.com>

Tue, Nov 7, 2023 at 3:56 PM

To: Alex Whitworth &lt;Alex.Whitworth@bclplaw.com&gt;, Martha Kohlstrand &lt;Martha.Kohlstrand@bclplaw.com&gt;

Hello Alex,

Please see attached for your review and signature based on the telephonic discussion.

Sincerely,

*Reshma Kamath*

## Law Office of Reshma Kamath

Counselor-at-Law | 2022 Elite Lawyer | Lawyers of Distinction

Address: Law Office of Reshma Kamath

700 El Camino Real Suite 120, #1084, Menlo Park, CA 94025

Phone: 650 257 0719 | E-mail: [reshmakamath2021@gmail.com](mailto:reshmakamath2021@gmail.com) |LinkedIn: [www.linkedin.com/in/globalcitizenwithjd/](https://www.linkedin.com/in/globalcitizenwithjd/) |Website: [www.myinstalawyer.com](http://www.myinstalawyer.com) |**RESHMA KAMATH**  
WWW.MYINSTALAWYER.COM*Selected to Rising Stars: 2023* **Best Lawyers logo**

2024

**CONFIDENTIALITY NOTICE:** This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the

intended recipient, please contact the sender and destroy all copies of the communication. Thank you for your cooperation. To ensure compliance with Internal Revenue Service Circular 230, we inform you that any tax advice contained in this communication is not intended or written to be used, and cannot be used for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any tax-related matter(s) addressed herein.



**DRAFT-Kamath v. Coinbase, Inc. - INTERNAL AGREEMENT.docx**

46K

**Alex Whitworth** <Alex.Whitworth@bclplaw.com>

Wed, Nov 8, 2023 at 11:21 AM

To: Reshma Kamath <reshmakamath2021@gmail.com>, Martha Kohlstrand <Martha.Kohlstrand@bclplaw.com>

Ms. Kamath,

Please see our redlines in the attached. Your draft contained several things that were unacceptable to Coinbase. It seems you are trying to game this to avoid arbitration and will ultimately seek to re-file in Court. This dispute should be resolved by an arbitrator for all the reasons we have previously discussed.

If these changes to the agreement are not acceptable, we will go ahead and file our motion to compel arbitration.

Best,

Alex



ALEXANDRA WHITWORTH

Partner

BRYAN CAVE LEIGHTON PAISNER LLP - San Francisco, CA USA

alex.whitworth@bclplaw.com

T: +1 415 675 3463

[Quoted text hidden]

This electronic message is from a law firm. It may contain confidential or privileged information. If you received this transmission in error, please reply to the sender to advise of the error and delete this transmission and any attachments.

We may monitor and record electronic communications in accordance with applicable laws and regulations. Where appropriate we may also share certain information you give us with our other offices (including in other countries) and select third parties. For further information (including details of your privacy rights and how to exercise them), see our updated Privacy Notice at [www.bclplaw.com](http://www.bclplaw.com).



**DRAFT-Kamath v. Coinbase Inc. - INTERNAL AGREEMENT.docx**

51K

**Reshma Kamath** <reshmakamath2021@gmail.com>

Wed, Nov 8, 2023 at 11:26 AM

To: Alex Whitworth <Alex.Whitworth@bclplaw.com>

Cc: Martha Kohlstrand <Martha.Kohlstrand@bclplaw.com>

Thank you. I think you have a strange perception of the world. It is a straightforward statement: there is no reason why me as Plaintiff would want to avoid arbitration. In fact, I am quite eager to avoid hassle of litigation.

If your client cannot agree to providing the materials in lieu of the subpoena, then please move forward with your motion. Either way, I'll subpoena Coinbase for the materials pertaining to my account.

I'll be initiating the arbitration today and based on your redlines, I will not voluntarily dismiss you anymore.

Sincerely,

Reshma Kamath, Counselor-at-Law  
Law Office of Reshma Kamath

Contact Information:

Law Office of Reshma Kamath

700 El Camino Real, Suite #120-1084, Menlo Park, CA 94025 | 650 257 0719 | reshmakamath2021@gmail.com |

www.myinstalawyer.com |

www.linkedin.com/in/globalcitizenwithjd/

Rising Stars 2023

Elite Lawyers 2022 2023

Lawyers of Distinction 2023

Best Lawyers 2024

[Quoted text hidden]

[Quoted text hidden]

---

**Alex Whitworth** <Alex.Whitworth@bclplaw.com>  
To: Reshma Kamath <reshmakamath2021@gmail.com>  
Cc: Martha Kohlstrand <Martha.Kohlstrand@bclplaw.com>

Wed, Nov 8, 2023 at 12:23 PM

Ms. Kamath,

I don't think we can agree to just hand over those documents absent a valid subpoena to which we would have the opportunity to object and narrow the scope. However, so I can accurately discuss the situation with my client – can you confirm that is your only problem with our edits? Are the other changes acceptable?

Thanks,

[Quoted text hidden]

[Quoted text hidden]

---

**Reshma Kamath** <reshmakamath2021@gmail.com>  
To: Alex Whitworth <Alex.Whitworth@bclplaw.com>  
Cc: Martha Kohlstrand <Martha.Kohlstrand@bclplaw.com>

Wed, Nov 8, 2023 at 12:34 PM

I cannot accept any of your changes including the tolling of the SoL. If you want to add to it, please do. Otherwise, only your stylistic changes are fine.

Sincerely,

*Reshma Kamath*



# Law Office of Reshma Kamath

Counselor-at-Law | 2022 Elite Lawyer | Lawyers of Distinction

Address: Law Office of Reshma Kamath

700 El Camino Real Suite 120, #1084, Menlo Park, CA 94025

Phone: 650 257 0719 | E-mail: [reshmakamath2021@gmail.com](mailto:reshmakamath2021@gmail.com) |

LinkedIn: [www.linkedin.com/in/globalcitizenwithjd/](https://www.linkedin.com/in/globalcitizenwithjd/) |

Website: [www.myinstalawyer.com](http://www.myinstalawyer.com) |



**RESHMA KAMATH**  
WWW.MYINSTALAWYER.COM



*Selected to Rising Stars: 2023*

 Best Lawyers logo

2024

**CONFIDENTIALITY NOTICE:** This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication. Thank you for your cooperation. To ensure compliance with Internal Revenue Service Circular 230, we inform you that any tax advice contained in this communication is not intended or written to be used, and cannot be used for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any tax-related matter(s) addressed herein.

[Quoted text hidden]

**Reshma Kamath** <[reshmakamath2021@gmail.com](mailto:reshmakamath2021@gmail.com)>  
To: Alex Whitworth <[Alex.Whitworth@bclplaw.com](mailto:Alex.Whitworth@bclplaw.com)>  
Cc: Martha Kohlstrand <[Martha.Kohlstrand@bclplaw.com](mailto:Martha.Kohlstrand@bclplaw.com)>

Wed, Nov 22, 2023 at 6:55 AM

Alex:

Please inform how you have decided to move forward with the arbitration. As you know, I have initiated a case, but I am not quite keen in dismissing it until there is a signed stipulation/ agreement between both parties.

[Quoted text hidden]

[Quoted text hidden]

**Martha Kohlstrand** <[Martha.Kohlstrand@bclplaw.com](mailto:Martha.Kohlstrand@bclplaw.com)>  
To: Reshma Kamath <[reshmakamath2021@gmail.com](mailto:reshmakamath2021@gmail.com)>, Alex Whitworth <[Alex.Whitworth@bclplaw.com](mailto:Alex.Whitworth@bclplaw.com)>

Mon, Dec 4, 2023 at 3:13 PM

Dear Ms. Kamath:

Attached please find our edits to your proposed stipulation/internal agreement. Please let us know your thoughts.

Relatedly, will you please confirm that you have initiated arbitration and provide us with an AAA case number? As of Friday, our client has not yet received the Demand, Complaint, and Initiation Letter. Thank you in advance.

Regards,

Martha Kohlstrand



MARTHA KOHLSTRAND

Associate

BRYAN CAVE LEIGHTON PAISNER LLP - Boulder, CO USA

martha.kohlstrand@bclplaw.com

T: +1 303 417 8516 M: +1 415 497 1585

---

**From:** Reshma Kamath <reshmakamath2021@gmail.com>  
**Sent:** Wednesday, November 22, 2023 7:55 AM  
**To:** Alex Whitworth <Alex.Whitworth@bclplaw.com>  
**Cc:** Martha Kohlstrand <Martha.Kohlstrand@bclplaw.com>  
**Subject:** Re: Kamath v. Coinbase, Inc. et al - INTERNAL AGREEMENT ONLY

[Quoted text hidden]

[Quoted text hidden]



---

**Kamath v. Coinbase, Inc. - Stipulation to Arbitrate Claims - [DRAFT 12-4-2023](609461600.4).docx**  
51K

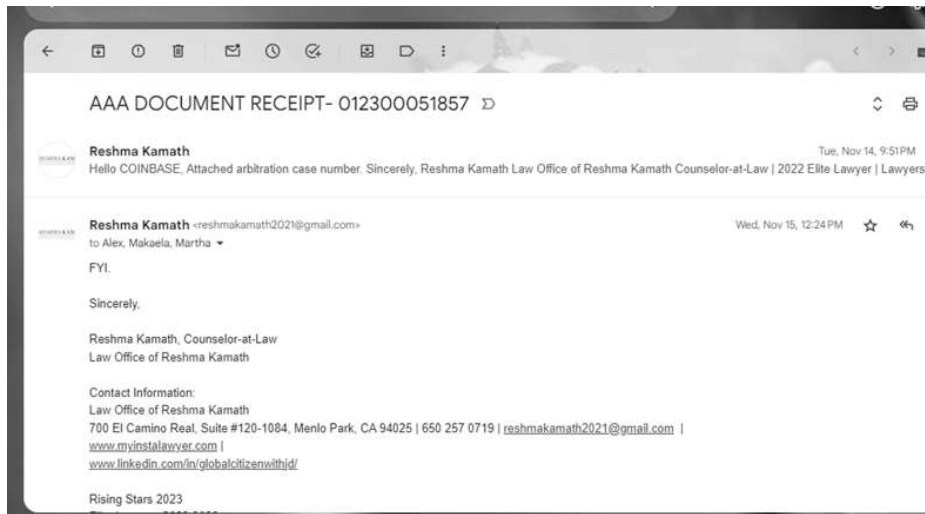
---

**Reshma Kamath** <reshmakamath2021@gmail.com>  
**To:** Martha Kohlstrand <Martha.Kohlstrand@bclplaw.com>  
**Cc:** Alex Whitworth <Alex.Whitworth@bclplaw.com>

Mon, Dec 4, 2023 at 8:54 PM

Hello Ms. Kohlstrand:

Thank you for your e-mail. I did forward you the e-mail on November 15, 2023 with the AAA Arbitration case number:



Attached are my edits for the internal stipulation. Please send the final clean copy once you accept the changes. Thank you.

Sincerely,

*Reshma Kamath*

## Law Office of Reshma Kamath

Counselor-at-Law | 2022 Elite Lawyer | Lawyers of Distinction

Address: Law Office of Reshma Kamath

700 El Camino Real Suite 120, #1084, Menlo Park, CA 94025

Phone: 650 257 0719 | E-mail: [reshmakamath2021@gmail.com](mailto:reshmakamath2021@gmail.com) |

LinkedIn: [www.linkedin.com/in/globalcitizenwithjd/](https://www.linkedin.com/in/globalcitizenwithjd/) |

Website: [www.myinstalawyer.com](http://www.myinstalawyer.com) |



*Selected to Rising Stars: 2023*



2024

**CONFIDENTIALITY NOTICE:** This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication. Thank you for your cooperation. To ensure compliance with Internal Revenue Service Circular 230, we inform you that any tax advice contained in this communication is not intended or written to be used, and cannot be used for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any tax-related matter(s) addressed herein.

[Quoted text hidden]



**2023-12-4-Plaintiff's draft-Kamath v. Coinbase, Inc. - Stipulation to Arbitrate Claims - [DRAFT 12-4-2023]**

**(609461600.4).docx**

53K

**Martha Kohlstrand** <Martha.Kohlstrand@bclplaw.com>  
To: Reshma Kamath <reshmakamath2021@gmail.com>  
Cc: Alex Whitworth <Alex.Whitworth@bclplaw.com>

Fri, Dec 15, 2023 at 10:13 AM

Dear Ms. Kamath,

Attached please find our edits to the stipulation/internal agreement. You will see we have accepted your edits, and have made two small changes:

3. Within 10- days of Plaintiff's filing the Notice of Voluntary Dismissal of Defendant Coinbase, Coinbase shall produce the following documents and communications to Plaintiff to the extent such documents and communications are in Coinbase's possession, ~~and~~ can be reasonably located, and are not subject to the attorney-client privilege or the work product doctrine. Unless otherwise specified, the relevant dates of the documents and communications to be produced are between March 2, 2022 and the present:

a. Communications in and between Plaintiff and Defendant Coinbase relating to the transfers out of Plaintiff's Coinbase account on March 2, 2022, March 3, 2022, and any further communications pertaining to Plaintiff and those two dates;

We also pushed the relevant dates back a bit since the original dates referenced have passed. Please let us know if these changes are acceptable. If so, please accept the changes, and date and sign the agreement.

Thanks,

Martha Kohlstrand



MARTHA KOHLSTRAND

Associate

BRYAN CAVE LEIGHTON PAISNER LLP - Boulder, CO USA

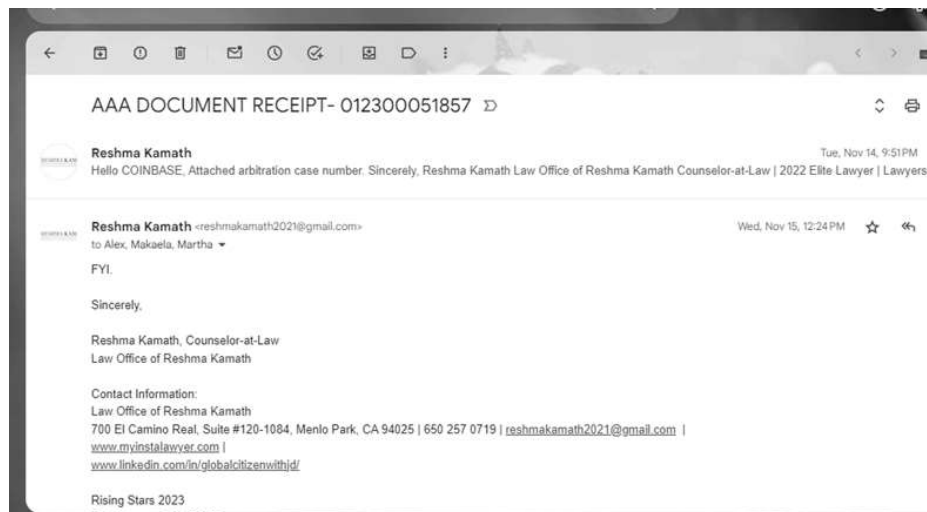
martha.kohlstrand@bclplaw.com  
T: +1 303 417 8516 M: +1 415 497 1585

---

**From:** Reshma Kamath <reshmakamath2021@gmail.com>  
**Sent:** Monday, December 4, 2023 9:54 PM  
**To:** Martha Kohlstrand <Martha.Kohlstrand@bclplaw.com>  
**Cc:** Alex Whitworth <Alex.Whitworth@bclplaw.com>  
**Subject:** Re: Kamath v. Coinbase, Inc. et al - INTERNAL AGREEMENT ONLY

Hello Ms. Kohlstrand:

Thank you for your e-mail. I did forward you the e-mail on November 15, 2023 with the AAA Arbitration case number:



[Quoted text hidden]  
[Quoted text hidden]  
[Quoted text hidden]



**Kamath v. Coinbase Inc. - Stipulation to Arbitrate Claims - DRAFT 12-15-2023 (Coinbase redline)**  
**(609624330.1).docx**  
50K

---

**Reshma Kamath** <reshmakamath2021@gmail.com>  
**To:** Martha Kohlstrand <Martha.Kohlstrand@bclplaw.com>  
**Cc:** Alex Whitworth <Alex.Whitworth@bclplaw.com>

Mon, Dec 18, 2023 at 11:50 AM

Please see attached with redlines.

Sincerely,

*Reshma Kamath*

## Law Office of Reshma Kamath

Counselor-at-Law | 2022 Elite Lawyer | Lawyers of Distinction

Address: Law Office of Reshma Kamath

700 El Camino Real Suite 120, #1084, Menlo Park, CA 94025

Phone: 650 257 0719 | E-mail: [reshmakamath2021@gmail.com](mailto:reshmakamath2021@gmail.com) |

LinkedIn: [www.linkedin.com/in/globalcitizenwithjd/](https://www.linkedin.com/in/globalcitizenwithjd/) |

Website: [www.myinstalawyer.com](http://www.myinstalawyer.com) |



RESHMA KAMATH  
W.W.H.YINSTALAWYER.COM



*Selected to Rising Stars: 2023*

 Best Lawyers logo

2024

**CONFIDENTIALITY NOTICE:** This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication. Thank you for your cooperation. To ensure compliance with Internal Revenue Service Circular 230, we inform you that any tax advice contained in this communication is not intended or written to be used, and cannot be used for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any tax-related matter(s) addressed herein.

[Quoted text hidden]



**FINAL-Kamath v. Coinbase Inc. - Stipulation to Arbitrate Claims-RESHMA KAMATH.docx**

52K

# EXHIBIT B

**RESHMA KAMATH**

700 El Camino Real, Suite 120, #1084

Menlo Park, CA 94025

Telephone: 650 257 0719

Email: reshmakamath2021@gmail.com

*Plaintiff, In Propria Persona*

**BRYAN CAVE LEIGHTON PAISNER LLP**

Alexandra C. Whitworth (California Bar No. 303046)

Three Embarcadero Center, 7th Floor

San Francisco, CA 94111-4070

Telephone: (415) 675-3400

Facsimile: (415) 675-3434

Email: alex.whitworth@bclplaw.com

*Attorneys for Defendant*

*COINBASE, INC.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RESHMA KAMATH,

Plaintiff,

v.

COINBASE, INC.; WELLS FARGO BANK,  
N.A.; AND DOES 1-10, INCLUSIVE,

Defendants.

Case No. 3:23-cv-3533

**PARTIES' INTERNAL AGREEMENT  
ONLY [NOT TO BE FILED WITH  
COURT]**

Complaint Filed: July 16, 2023  
Trial Date: Not Assigned



1 This Stipulation is entered into by and between Plaintiff Reshma Kamath and Defendant  
2 Coinbase, Inc. ("Coinbase"). Plaintiff and Defendant are collectively referred to as the "Parties."

3 WHEREAS, on July 16, 2023, Plaintiff Reshma Kamath filed her Complaint in this action;

4 WHEREAS, Defendant Coinbase contends that Plaintiff has previously accepted Coinbase's  
5 User Agreement, which is a contract that contains a mandatory arbitration clause;

6 WHEREAS, Defendant Coinbase waived service of process of complaint, summons, and  
7 case-initiating documents upon plaintiff's Service of form on November 2, 2023;

8 WHEREAS, the Parties have met and conferred and agreed on a stipulation that would avoid  
9 further litigation and take this matter to arbitration;

10 NOW, THEREFORE, the Parties hereby agree and stipulate to the following:

11 1. Plaintiff Reshma Kamath has offered to file a Notice of Voluntary Dismissal of  
12 Defendant Coinbase only, for the parties to litigate this matter in arbitration and/or attempt to resolve  
13 the matter out-of-court, only if Defendant Coinbase provides a starting counter-offer to Plaintiff  
14 Reshma Kamath prior to Plaintiff Reshma Kamath filing such Notice

15 2. On or before 5 p.m. PT on December 21, 2023, Plaintiff Reshma Kamath shall file a  
16 notice of voluntary dismissal, dismissing Coinbase from this Action, only if Defendant Coinbase  
17 makes the arbitration fee payment on or before December 21, 2023, and responds to the Plaintiff's  
18 Arbitration Petition within five days of service of the Demand for Arbitration;

19 3. Within 10-days of Plaintiff Reshma Kamath's filing the Notice of Voluntary  
20 Dismissal of Defendant Coinbase, Coinbase shall produce to Plaintiff Reshma Kamath the following  
21 documents, communications, and telephone calls, to the extent such documents and communications  
22 are in Coinbase's possession, and can be reasonably located. Unless otherwise specified, the relevant  
23 dates of the documents and communications to be produced are between March 2, 2022 and the  
24 present:

- 25 a. Communications in and between Plaintiff Reshma Kamath and Defendant  
26 Coinbase relating to the transfers out of Plaintiff Reshma Kamath's Coinbase  
27 account on March 2, 2022, March 3, 2022, and any further communications

- 1 pertaining to Plaintiff relating to any transactions occurring on those two dates;
- 2 b. Transaction records relating to Plaintiff's Coinbase account between June 9, 2017
- 3 (the date Plaintiff opened her Coinbase account) and the present;
- 4 c. The operative Coinbase User Agreement in effect on March 2, 2022 and March
- 5 3, 2022; as well as the original Agreement when Plaintiff signed up;
- 6 d. The three-day policy terms of transfer waiting that appeared on Coinbase on
- 7 March 2, 2022 and March 3, 2022;
- 8 e. A pseudo account created in Russian under some other individual's name using
- 9 Plaintiff's e-mail address.

10 Based upon the above, the Parties agree that this document is not filed with the Court; and

11 that the matter be arbitrated. This agreement and the arbitration proceedings shall remain

12 confidential.

13 DATED: December 15, 2023

**BRYAN CAVE LEIGHTON PAISNER LLP**

14 By: /s/ Alexandra C. Whitworth

15 Alexandra C. Whitworth

16 Attorneys for Defendant Coinbase, Inc.

17 DATED: December 18, 2023

**RESHMA KAMATH**

18 Plaintiff, *In propria persona*

19 */s/ Reshma Kamath*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28